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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PHYLLIS NICHOLS, ROBIN COOK, and
LAWRENCE NOVIDA, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 4:24-CV-02914-JSW

**JOINT STIPULATION AND
[PROPOSED] ORDER GRANTING
JOINT STIPULATION TO EXTEND
META'S DEADLINE TO RESPOND TO
AMENDED COMPLAINT**

Date Action Filed: April 9, 2024

Judge: Honorable Jeffrey S. White

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, plaintiffs and Defendant Meta Platforms,
2 Inc. (“Meta”) by and through their respective counsel of record, hereby stipulate as follows:

3 WHEREAS, this action was filed in the Superior Court of California for the County of San
4 Mateo on April 9, 2024;

5 WHEREAS, on May 14, 2024, Meta filed a notice of removal in the Superior Court of
6 California for the County of San Mateo removing this case to the Northern District of California where
7 it was assigned Case No. 4:24-cv-02914-DMR;

8 WHEREAS, on May 17, 2024, the parties submitted a joint stipulation to extend Meta’s
9 deadline to respond to the Complaint (Dkt. 11);

10 WHEREAS, on May 17, 2024, the parties submitted a joint stipulation to propose a briefing
11 schedule for Meta’s anticipated motion to dismiss plaintiff’s Complaint (Dkt. 12);

12 WHEREAS, on May 24, 2024, the Court granted the parties’ joint stipulation and issued an
13 order setting the briefing schedule for Meta’s anticipated motion to dismiss plaintiff’s Complaint (Dkt.
14 20);

15 WHEREAS, on July 10, 2024, Meta filed a Motion to Dismiss (Dkt. 22) and a Request for
16 Judicial Notice (Dkt. 23);

17 WHEREAS, in lieu of responding to Meta’s Motion to Dismiss and Request for Judicial Notice,
18 plaintiff stated it intended to amend the operative Complaint (Dkt. 1) and requested a 21-day extension
19 to August 21, 2024 to do so, and Meta consented to the requested extension;

20 WHEREAS, on July 26, the parties submitted a joint stipulation to propose a briefing schedule
21 for Meta’s contemplated motion to dismiss and to continue case deadlines as modified (Dkt. 24);

22 WHEREAS, on July 29, 2024, the Court granted the parties’ joint stipulation and issued an
23 order setting the briefing schedule for Meta’s anticipated motion to dismiss plaintiffs’ amended
24 complaint (Dkt. 25);

25 WHEREAS on August 21, 2024, plaintiffs filed a 43-page Amended Class Action Complaint,
26 adding two additional named plaintiffs and asserting eight claims for relief on behalf of an alleged
27 nationwide class (Dkt. 26);
28

1 WHEREAS, the parties have met and conferred and agree that additional time is warranted to
2 brief Meta's contemplated motion to dismiss the amended complaint;

3 WHEREAS, the parties have come to an agreement to propose the following briefing schedule
4 for Meta's contemplated motion to dismiss:

- 5 a. Meta's deadline to answer or otherwise respond to the forthcoming amended complaint
6 will be October 29, 2024;
- 7 b. Plaintiffs' deadline to file their Opposition to any motion to dismiss will be December
8 6, 2024;
- 9 c. Meta's deadline to file a reply in support of any motion to dismiss will be December 20,
10 2024.

11 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
12 plaintiffs and Meta, subject to the approval of this Court, that the following deadlines will be revised
13 as follows:

14

Event	Deadline
Answer or Other Response to the Amended Complaint	October 29, 2024
Opposition to any Motion to Dismiss	December 6, 2024
Reply in Support of any Motion to Dismiss	December 20, 2024

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19 IT IS SO STIPULATED.
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1 DATED: October 11, 2024

GIBSON, DUNN & CRUTCHER LLP

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3 By: /s/Elizabeth K. McCloskey

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1 DATED: October 11, 2024

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CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Elizabeth K. McCloskey, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: October 11, 2024

By: /s/ Elizabeth K. McCloskey